

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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2005 DEC 27 P 3:53

DISTRICT COURT
DISTRICT OF MASS.

SHELDON G. ADELSON,

Plaintiff,

v.

MOSHE HANANEL,

Defendant.

Docket No. 04CV10357RCL

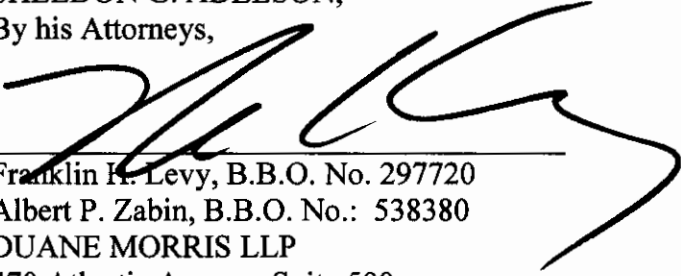
MOTION FOR LETTERS ROGATORY

The plaintiff requests that this Honorable Court issue the Letters Rogatory, a copy of which is attached hereto. The purpose of this request is to take the oral deposition of Richard Suen, a citizen and resident of Hong Kong.

Mr. Suen has brought suit against the Venetian, claiming that he is entitled to a fee because he was the cause of the Venetian obtaining a license to operate gambling in Macao. He allegedly dealt with the Chinese and Macao authorities. Mr. Suen cannot be compelled to testify at trial in the United States and only through a deposition in this case¹ can his testimony be obtained.

¹ There are no oral depositions or procedures to compel such deposition testimony outside of Israel in civil cases in the Israeli court system.

Respectfully submitted,
The Plaintiff,
SHELDON G. ADELSON,
By his Attorneys,



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DATED: December 27, 2005

CERTIFICATE OF SERVICE

I, Franklin H. Levy, hereby certify that I served a copy of the foregoing on all Defendants this 27th day of December, 2005, via hand to the following:

James A. G. Hamilton, Esquire
Perkins Smith & Cohen
30th Floor
One Beacon Street
Boston, MA 02108-3106



Franklin H. Levy